

AO 91 (Rev. 11/11) Criminal Complaint

FILED
SIGNED BY HAGEL
CLERK OF COURT

UNITED STATES DISTRICT COURT

for the

2019 FEB 27 AM 11:38

Southern District of Ohio

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WESTERN DIV. DAYTON

United States of America

)

v.

)

Dramier J Davis Sr.

)

Case No.

3:19-mj-124

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2/26/2019 in the county of Montgomery in the
Southern District of Ohio, the defendant(s) violated:*Code Section**Offense Description*21 USC s. 846 & 841(b)(1)(B) conspiracy to possess with intent to distribute 500 grams or more of
methamphetamine, a Schedule II controlled substance

This criminal complaint is based on these facts:

See Attached Affidavit of Brad Dorman

 Continued on the attached sheet.*Brad Dorman*
Complainant's signature

Brad Dorman, US Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 2/27/19City and state: Dayton, Ohio*Michael Newman*
Judge's signature

Michael Newman, US Magistrate Judge

Printed name and title

ATTACHMENT "A"

AFFIDAVIT

I, Brad M. Dorman, Postal Inspector, being duly sworn, do hereby depose and state as follows:

1. I am a United States Postal Inspector, having been so employed since August 2017. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the United States Postal Inspection Service with investigative responsibility for southeast Indiana, and southern Ohio. Your Affiant completed United States Postal Inspection Service Basic Training in August 2017. The training involved narcotic investigation techniques, chemical field tests and training in the detection and identification of controlled substances being transported in the United States Mail. In addition to this formal training, I have worked since August 2017 with various federal, state and local law enforcement agencies in the investigation of the transportation of illegal drugs and their identification.

2. I am charged with the duty of enforcing among other Titles, Title 18 and Title 21 of the United States Code, together with other assigned duties as imposed by federal law. This Affidavit is submitted in support of a criminal complaint, and seeks the issuance of an arrest warrant against, Dramier J DAVIS Sr, for violations of 21 U.S.C. § 846 and 841(b)(1)(B) (conspiracy to possess with intent to distribute approximately 500 grams or more of Methamphetamine, a Schedule II controlled substance). The information contained in this Affidavit is largely based upon an investigation conducted by your Affiant and other law enforcement officers. All of the details of the investigation are not included in this Affidavit, rather only information necessary to establish probable cause of the above-described violations.

FACTS

FACTS SUPPORTING PROBABLE CAUSE

1. On or about February 25, 2019, I intercepted a Priority Mail Package (hereafter referred to as "the Package") at the Huber Heights Post Office (5425 Fishburg Road, Dayton, Ohio 45424). The Package was addressed to Aaron Miller, 6348 Appleseed Pl, Dayton, OH 45424 with a return address of Jason Miller, 134 E 104th ST, Los Angeles, CA 90003. The Package weighed 3 pounds 1.1 ounces and was postmarked February 21, 2019. The Package is further identified as Priority Mail Package, bearing Tracking Number 9505512592179052022111. Through my training and experience, I have learned of certain characteristics indicative of other U.S. Mail items previously identified as containing narcotics or other dangerous controlled substances, their proceeds or instrumentalities from the sale of the controlled substances. Some of these characteristics include, but are not necessarily limited to or used on every occasion, the mailer using different post offices on the same day to send parcels, false or non-existent return address, the addressee is not known to receive mail at the listed delivery address, the parcel is heavily taped, the parcel is mailed to/from a known drug source location, labeling information contains misspellings, labeling information contains fictitious names, the label contains an illegible waiver signature, unusual odors emanating from the parcel, and the listed address is located in an area of known or suspected drug activity.

2. On February 25, 2019, I queried 6348 Appleseed Pl, Dayton, OH 45424, the address listed on the Package, in the Consolidated Lead Evaluation and Reporting (CLEAR) database system. CLEAR is a public record data investigative platform available exclusively to law enforcement and other government investigators about people and businesses. CLEAR indicated that Aaron Miller is not associated with 6348 Appleseed Pl, Dayton, OH 45424.
3. On February 25, 2019, I queried 134 E 104th ST, Los Angeles, CA 90003, the sender's information on the Package. CLEAR indicated that Jason Miller is not associated with 134 E 104th ST, Los Angeles, CA 90003.
4. On February 25, 2019, I obtained a federal search warrant which was then executed on the Package. Upon opening the Package, I removed a sealed metal can. Inside the sealed metal can were two vacuum sealed bags containing a crystal like substance and weighing a total of approximately 986 grams. A field test on the substance was performed with a positive result for Methamphetamine, a Schedule II controlled substance.
5. On February 26, 2019, at approximately 12:26pm, the Package was delivered to 6348 Appleseed Pl, Dayton, OH 45424, by a United States Postal Inspector acting as a United States Letter Carrier in an undercover capacity. A Federal Anticipatory Search Warrant was also obtained for 6348 Appleseed Pl, Dayton, OH 45424, to be executed if the Package was taken in to the residence. A female subject, later identified as Sherita LYNCH, answered the door and accepted the package into 6348 Appleseed Pl, Dayton, OH 45424.
6. On February 26, 2019, at approximately 1:16pm, a silver in color Buick (bearing OH tag HUF5486) backed out of the garage and left the residence. The driver of this vehicle was

LYNCH and was observed by undercover law enforcement personnel.

7. On February 26, 2019, moving surveillance was conducted on LYNCH. At approximately 3:23pm, LYNCH was observed stopping at 1358 Canfield Ave, Dayton, OH 45406. Agents with the Montgomery County Sheriff's Office RANGE Task Force observed LYNCH going to the trunk of her car and appear to be opening something. Agents moved in and detained LYNCH. It was found that LYNCH was opening the Package.
8. LYNCH was read her Miranda Rights, verbally acknowledged that she understood them, and wanted to speak with law enforcement. LYNCH stated that her soon-to-be brother-in-law, who she identified as DAVIS, asked if he could have a package sent to her residence. LYNCH stated she assumed the package was for her sister and that DAVIS wanted to keep it hidden from her sister, so she agreed. LYNCH stated that DAVIS was constantly bugging her about the Package and if it had arrived. LYNCH stated she became nosy about what was in the Package and opened it. LYNCH observed the metal can and immediately became suspicious about what was inside and that's when law enforcement detained her.
9. LYNCH agreed to place a call to DAVIS and tell him the Package had arrived and she had it in her vehicle. Agents set up surveillance at DAVIS' home, 411 Marathon Avenue, Dayton, OH 45406. Agents observed DAVIS get into a white Dodge Charger and leave the residence. Moving surveillance was conducted on DAVIS. DAVIS was observed driving by LYNCH's vehicle but never stopped to pick up the Package. Shortly after, law enforcement conducted a traffic stop of DAVIS and he was detained.

10. DAVIS was advised of his Miranda Rights, acknowledged that he understood his rights, and agreed to speak with law enforcement. DAVIS did admit that he ordered Marijuana, paid \$2000 for it, and expected it to come via US Mail.

11. Based on the facts set forth in the Affidavit, your Affiant believes that there is probable cause to issue a criminal complaint and arrest warrant against Dramier J DAVIS Sr of 21 U.S.C. § 846 and 841 (b)(1)(B) (conspiracy to possess with intent to distribute 500 grams or more of Methamphetamine, a Schedule II controlled substance).



Brad M. Dorman, Postal Inspector
United States Postal Inspection Service

Subscribed and sworn to before me on 27th February, 2019.


Honorable Michael J. Newman
United States Magistrate Judge